

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

SOUTHERSBY DEVELOPMENT  
CORPORATION,

Plaintiff,

v.

BOROUGH OF JEFFERSON HILLS  
AND WILLIAM L. McVICKER, in his  
individual and official capacity,

Defendants.

No. 2:09-cv-00208-MPK

MAGISTRATE JUDGE  
MAUREEN P. KELLY

PAUL R. ROBINSON, ESQUIRE  
PA I.D. No. 65581

ELECTRONICALLY FILED

**JURY TRIAL DEMANDED**

**MOTION TO WITHDRAW APPEARANCE  
OF JAMES D. MILLER, ESQUIRE**

AND NOW, comes the plaintiff, SOUTHERSBY DEVELOPMENT CORPORATION, by its counsel, PAUL R. ROBINSON, ESQUIRE and MEYER, DARRAGH, BUCKLER, BEBENEK & ECK, P.L.L.C., filing its motion to withdraw the appearance of James D. Miller, Esquire, averring as follows:

1. James D. Miller, Esquire of Meyer, Darragh, Buckler, Bebenek & Eck, P.L.L.C. is listed as co-counsel of record for the plaintiff, Southersby Development Corporation.

2. James D. Miller, Esquire is leaving the employment of Meyer, Darragh, Buckler, Bebenek & Eck, P.L.L.C. as of August 4, 2011.

3. James D. Miller, Esquire will no longer be acting as co-counsel for the plaintiff in this matter.

WHEREFORE, Southersby Development Corporation respectfully request that this Honorable Court grant this motion and order the appearance of James D. Miller, Esquire withdrawn as counsel of record for the plaintiff. A proposed order is attached.

Respectfully submitted,

MEYER, DARRAGH, BUCKLER,  
BEBENEK & ECK, P.L.L.C.

By: /s/ Paul R. Robinson  
PAUL R. ROBINSON, ESQUIRE  
Counsel for Southersby Development  
Corporation

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### PROOF OF SERVICE

This is to certify that a true and correct copy of the foregoing document has been served upon all parties on the date and in the manner listed below:

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at the following address:

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*(Counsel for William L. McVicker)*

MEYER, DARRAGH, BUCKLER,  
BEBENEK & ECK, P.L.L.C.

Date: August 4, 2011

/s/ Paul R. Robinson  
PAUL R. ROBINSON, ESQUIRE